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IN THE UNITED STATE DISTRICT
 COURT OF NEVADA

STEVE COBURN,
 Plaintiff,

Case No.: 2:23-cv-00162-GMN-BNW

v.
 COUNTY OF CLARK,
 Defendants.

STIPULATION AND ORDER TO EXTEND THE SCHEDULING ORDER DEADLINES
(First Request)

COMES NOW the parties, by and through their respective counsel, and hereby stipulate to extend the Scheduling Order deadlines in this case, which follow for a period of one hundred twenty (120) days:

Deadline	Current	Proposed Extension
Initial Expert Disclosure Deadline:	June 22, 2023	October 20, 2023
Rebuttal Expert Disclosure Deadline:	July 24, 2023	November 21, 2023
Discovery Deadline:	August 21, 2023	December 19, 2023
Dispositive Motion Deadline:	September 20, 2023	January 18, 2024
Joint Pretrial Order:	October 20, 2023	February 20, 2024

This is the first request for an extension of the Scheduling Order deadlines. The parties provide the following information to this Court regarding the proposed extension of the Scheduling Order deadlines.

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Discovery Completed to Date

The parties have served their initial disclosures.

Remaining Discovery to be Completed

Counsel have discussed additional discovery that needs to occur. The parties need to serve and respond to formal discovery requests. At least four (4) witnesses will need to be deposed. A couple of witnesses no longer reside in the State of Nevada. The parties will need to coordinate and cooperation to depose these witnesses. Experts will need to be retained and deposed. The parties and/or persons most knowledgeable will need to be deposed. Additional formal follow up discovery may be necessary.

Reasons Discovery Could Not be Completed Within the Existing Deadlines

The 26(f) Conference was held on March 15, 2023. The parties produced their initial disclosures by April 14, 2023. The parties prepared for the Early Neutral Evaluation that was held on May 4, 2023. The parties were not able to resolve this matter. There is not sufficient time to complete the remaining discovery.

Proposed Schedule for Completion of All Remaining Discovery

The parties believe they will be able to designate initial expert witnesses and reports by the proposed deadline of October 20, 2023. The parties believe they will be able to designate rebuttal expert witnesses and reports by the proposed deadline of November 21, 2023. The parties believe they will be able to complete discovery by the proposed deadline of December 19, 2023.

RESPECTFULLY SUBMITTED.
DATED this 2nd day of June, 2023.

LAW OFFICE OF DANIEL MARKS

/s/ Daniel Marks

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DATED this 2nd day of June, 2023.

DISTRICT ATTORNEY, CIVIL DIVISION

/s/ Stephanie Mazzei

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1 IT IS SO ORDERED.
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4 UNITED STATES JUDGE

5 DATED this 5th day of June, 2023.
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